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ORANGE COUNTY LOS ANGELES SAN FRANCISCO SACRAMENTO FRESNO

December 23, 2021

Zachary Kweller, Esq.
Pacific Workers' Compensation Law Center
333 Hegenberger Rd., Ste. 504
Oakland, CA 94621

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No: ADJ12031731
Claim No: 040519008736


Dear Mr. Kweller:

As you can see, following the deposition of QME Dr. Stoller, there are numerous issues with his reporting.

It is also assumed, according to the AMA Guides, that your client was not giving his best effort during the grip strength testing, and this calls into question all of your client's subjective complaints. Based on these issues, I believe \$30,000.00 is a reasonable Compromise and Release at this time. Upon receipt of the deposition transcript and supplemental report, I will request a DEU rating.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY: 
AMY E. OLSON

AEO/mg

cc: *Mario Castro/Chubb Group of Insurance Companies (Via Email Only)*
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